

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

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MARC VEASEY, JANE HAMILTON, )  
SERGIO DELEON, FLOYD J. CARRIER, )  
ANNA BURNS, MICHAEL MONTEZ, )  
PENNY POPE, OSCAR ORTIZ, KOBY )  
OZIAS, JOHN MELLOR-CRUMLEY, PEGGY )  
HERMAN, EVELYN BRICKNER, GORDON )  
BENJAMIN, KEN GANDY, LEAGUE OF )  
UNITED LATIN AMERICAN CITIZENS )  
(LULAC), AND DALLAS COUNTY, TEXAS, )

*Plaintiffs,*

v.

RICK PERRY, Governor of Texas; and JOHN )  
STEEN, Texas Secretary of State, )

*Defendants.*

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UNITED STATES OF AMERICA, )

*Plaintiffs,*

TEXAS LEAGUE OF YOUNG VOTERS )  
EDUCATION FUND, IMANI CLARK, )  
AURICA WASHINGTON, CRYSTAL )  
OWENS, AND MICHELLE BESSIAKE, )

*Plaintiff-Intervenors,*

TEXAS ASSOCIATION OF HISPANIC )  
COUNTY JUDGES AND COUNTY )  
COMMISSIONERS, HIDALGO COUNTY, )  
AND MARIA LONGORIA BENAVIDES, )

*Plaintiff-Intervenors,*

v.

STATE OF TEXAS, JOHN STEEN, in his )  
official capacity as Texas Secretary of State; )  
and STEVE McCRAW, in his official capacity )  
as Director of the Texas Department of Public )  
Safety, )

*Defendants.*

CIVIL ACTION NO.

2:13-CV-193 (NGR)

[Lead case]

CIVIL ACTION NO.

2:13-CV-263 (NGR)

[Consolidated case]

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TEXAS STATE CONFERENCE OF NAACP  
 BRANCHES; and the MEXICAN  
 AMERICAN LEGISLATIVE CAUCUS OF  
 THE TEXAS HOUSE OF  
 REPRESENTATIVES,  
*Plaintiffs,*

v.

JOHN STEEN, in his official capacity as  
 Secretary of State of Texas; and STEVE  
 McCRAW, in his official capacity as Director  
 of the Texas Department of Public Safety,  
*Defendants.*

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BELINDA ORTIZ, LENARD TAYLOR,  
 EULALIO MENDEZ JR., LIONEL  
 ESTRADA; ESTELA GARCIA ESPINOSA,  
 ROXANNE HERNANDEZ, LYDIA LARA,  
 MARGARITO MARTINEZ LARA,  
 MAXIMINA MARTINEZ LARA, AND  
 LA UNION DEL PUEBLO ENTERO, INC.  
*Plaintiffs,*

v.

STATE OF TEXAS; JOHN STEEN, in his  
 Official capacity as Texas Secretary of State;  
 and STEVE McCRAW, in his official capacity  
 as Director of the Texas Department of  
 Public Safety,  
*Defendants.*

CIVIL ACTION NO.  
 2:13-CV-291 (NGR)  
 [Consolidated case]

CIVIL ACTION NO.  
 2:13-CV-348 (NGR)  
 [Consolidated case]

**DEFENDANTS' SUPPLEMENTAL RESPONSE IN OPPOSITION TO  
 UNITED STATES' MOTION TO COMPEL THE PRODUCTION OF  
LEGISLATIVE DOCUMENTS**

During the April 8, 2014 hearing, the Court instructed the review of all the  
 contested attorney-client documents identified by the United States. *See* No. 2:13-  
 cv-193, Minute Entry, Apr. 8, 2014 ("Texas to go through documents by Friday at

noon.”); ECF No. 162.1; *and* Ex. 1 (e-mail from D. Freeman to counsel for Defendants, Apr. 3, 2014). That review and supplemental production was completed by noon on April 11, 2014, as instructed by the Court. *See* Ex. 2 (letter from D. Whitley to D. Freeman, Apr. 11, 2014); Ex. 3 Defendants’ Document Review (Apr. 11, 2014); *and* Ex. 4 (Supplemental Attorney-Client Privilege Log (Apr. 11, 2014)).

Dated: April 14, 2014

Respectfully submitted,

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COUNSEL FOR THE STATE OF TEXAS,  
RICK PERRY, JOHN STEEN, and STEVE  
MCCRAW

**CERTIFICATE OF SERVICE**

I hereby certify that on April 14, 2014, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ G. David Whitley  
G. DAVID WHITLEY